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FROM: Benjamin Barra  
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#### Prune Pull-out Program

I am writing this letter today to express my frustration with the Agricultural Marketing Service's (AMS) position regarding the definition of "removal" in the program. It appears to me that the definition listed as sec. 81.3 differs greatly from what I have been told by (AMS) marketing specialist Richard P. Van Deist. It seems to me that grafting the Prune-Plum trees to a Pluot, or an Aprium would by definition not be classified a Prune-Plum.

In section 81.3 part B it states that " Removal means that the Prune-Plum trees are no longer standing and capable of producing a crop. The producer can accomplish removal by any means the producer desires." By grafting the trees to a Pluot or an Aprium, The Prune-Plum trees will no longer be standing, nor will they be able to produce a crop of Prune-Plums. In fact, the trees themselves could not even be considered Prune-Plums because they would be Either a Pluot, or an Aprium, on Marianna rootstock. No part of the Prune-Plum would be left. This seems to cover the definition of removal in the program.

I have heard the argument that grafting is not allowed because, " the cost of grafting is less than a pull-out". That statement is patently not true. In fact the total cost of grafting is greater than a pull-out. The cost of removing the limbs is greater because you must physically cut and remove the main limbs. The cost of grafting is roughly \$3.50-\$4.00/ tree. And you must go back in the field to physically remove the part of the trunk the grafter cut off. Finally you must pay for the graft wood and royalties to the nursery, which together will run \$4.00-\$4.50/tree. So it is easy to see that the cost is easily higher to graft than to pull out.

Therefore I intend to submit my application shortly. I will state on it that I intend to graft my trees, and that I will not ever put Prune-Plums on my property. I expect my application to be accepted and will comply with the requirements listed under section 81.5 of the program. If you have questions or comments, I would be happy to meet with you to discuss any issues you may have.

Sincerely,

Benjamin Barra

cc. U.S. Representative George Radanovich  
cc. U.S. Senator Diane Fienstien